

Application GRANTED. Defendant's sentencing submission is due by **December 20, 2024**. The Government's sentencing submission is due by **January 7, 2025**. Defendant's sentencing submission shall not exceed 50 pages.

Weil, Gotshal & Manges LLP

The Clerk of Court is directed to terminate ECF No. 537.

SO ORDERED.


Jennifer H. Rearden, U.S.D.J.

Dated: December 5, 2024

December 4, 2024

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ELECTRONICALLY FILED

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Menachem Lieberman*, 23-cr-4-JHR-2

Dear Judge Rearden:

I represent the defendant, Menachem Lieberman, in the above-captioned matter. Mr. Lieberman is currently scheduled to be sentenced before this Court on January 17, 2025. The parties had previously suggested that Mr. Lieberman's sentencing memorandum be due on December 6, 2024, to give the Court adequate time to consider the remaining factual disputes between the parties. By order dated November 11, 2024, the Court adopted that schedule.

I write now, with the consent of the Government, to respectfully request a two-week extension of time, to December 20, 2024, to submit our sentencing memorandum and accompanying materials. This extension is needed to allow Mr. Lieberman and counsel additional time to gather materials relevant to his sentencing, including a number of letters from friends, family, and members of the community that we believe will be forthcoming shortly after the initial submission date. In addition, to support Mr. Lieberman's position on one of these factual issues, counsel submitted on October 10, 2024, a request for documents to the New York City Administration for Children's Services ("ACS"), pursuant to the New York State Freedom of Information Law ("FOIL"). On November 20, 2024, counsel received notice from ACS that its estimated response date is January 17, 2025. We conferred with the Government about this issue, and thanks to their efforts,

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received today from the Government a response from ACS. A two-week extension will allow counsel adequate time to evaluate ACS's response and incorporate it into Mr. Lieberman's sentencing submission.

If this motion is granted, the parties propose that Mr. Lieberman's submission be due on December 20, 2024, and the Government's submission be due on January 7, 2025. I've conferred by email with AUSA Daniel Wolf, who informed me that the Government consents to this request and the proposed briefing schedule. This is Mr. Lieberman's first request for an extension of time to file his sentencing memorandum.

Finally, Mr. Lieberman also requests that the Court allow him to file a submission in excess of the Court's 25-page limit for sentencing memoranda. In addition to the factual issues that the parties plan to discuss, we would appreciate additional space to provide more information to the Court about the nature and circumstances of the offense, and Mr. Lieberman's personal characteristics and community involvement, which we believe will be relevant to the Court's analysis at sentencing. Accordingly, we respectfully request that the Court allow Mr. Lieberman's submission to be limited to 50 pages, double-spaced. The Government has informed us that it takes no position on this request.

Respectfully submitted,

/s/ Daniel L. Stein
Daniel L. Stein

Cc: AUSAs Daniel Wolf, Catherine Ghosh, and Stephanie Simon (via ECF)